

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

RAJENDRA D. BADGAIYAN, M.D.,)	
)	
Plaintiff)	
)	
v.)	C.A. No. 04-12031-JLT
)	
ANTHONY J. PRINCIPI, Secretary,)	
Department of Veterans' Affairs;)	
President and Fellows of)	
HARVARD COLLEGE; and)	
GRACE J. MUSHRUSH, M.D.,)	
)	
Defendants)	
)	

ASSENTED TO MOTION TO EXTEND TIME FOR RESPONSE TO DEFENDANTS'
MOTIONS FOR SUMMARY JUDGMENT

NOW COMES the plaintiff, Rajendra D. Badgaiyan, M.D., with the assent of the defendants, and respectfully moves for an extension, to November 30, 2006, for the filing of his Opposition to the Defendants' Motions for Summary Judgment.

As reasons, plaintiff's counsel needs the additional time to fully and properly respond to these potentially dispositive motions. He has had a crush of business, has had to make and will continue to have to make numerous trips out of state in connection with settling his elderly mother in an assisted living facility, and has packed in numerous court appearances prior to November 5th - 18th, when he and his wife are to visit their son, a Peace Corps volunteer, in Romania. This request is not being made for any purpose of delay.

Wherefore, the plaintiff moves for an extension of time, to November 30, 2006, by which to file his Opposition to the Defendants' Motions for Summary Judgment.

Respectfully submitted,
the plaintiff,
by his attorney:

/s/ Gregory R. Barison

Gregory R. Barison
BBO # 029340

Weston Patrick, P.A.
84 State Street / 11th Floor
Boston, MA 02109
(617) 742-9310 / fax: (617) 742-5734

Assented to: President and Fellows of Harvard College

/s/ Daniel S. Field

DANIEL S. FIELD, ESQ.
BBO # 560096
MORGAN, BROWN & JOY LLP
200 STATE STREET
BOSTON, MA 02109-2605

Anthony J. Principi, Secretary & Department of Veteran's Affairs &
Grace Mushrush, M.D.

/s/ Rayford Farquhar

RAYFORD FARQUHAR, ESQ.
ASSISTANT UNITED STATES ATTORNEY
OFFICE OF THE UNITED STATES ATTORNEY
JOHN. J. MOAKELY U.S. COURTHOUSE - STE 9200
ONE COURTHOUSE WAY
BOSTON, MA 02210

date: October 20, 2006